Prepared For:

Chicago International Exporting
4020 S. Wentworth Avenue
Chicago, Illinois 60609

DRAFT

Operating and Contingency Plan
Pursuant to U.S. EPA Administrative Order (dated February 6, 1995)

IE Job No. C065-079

Prepared By:

International Engineers, Inc.
1776B S. Naperville Road, Suite 102
Wheaton, IL 60187-8100
(708) 260-0203
(708) 260-0797 (Fax)

Date: July 5, 1995

TABLE OF CONTENTS

I. GENERAL DESCRIPTION OF OPERATIONS

The Chicago International Exporting (CIE) site is located at 4004-4020 S. Wentworth Avenue, and 4000-4027 S. Wells Street, Chicago, Cook County, Illinois. The facility is an active scrap yard that reclaims copper, aluminum and steel from electric motors and other large pieces of machinery. Copper, aluminum and steel are sold to recyclers who further recycle it for use in new equipment. The plant site is approximately 2.5 acres in size located west of Dan Ryan Expressway, south of the Burlington Northern Railroad tracks and lying between Wentworth Avenue and Wells Street. This operating plan provides a brief description of the general operations at CIE and a process flow diagram; identifies the sources of hazardous material contamination and further describes the operating procedures being implemented to control any escaping of the hazardous material into the adjoining atmosphere.

A. Process Flow Diagram

A process flow diagram of CIE is attached as Figure 1 of this document. In general, there are approximately 15 types of materials that are brought into the site. Of the 15 types of materials, approximately 9 types of material constitute the major portion of the incoming stream. They are:

1. Sealed units (compressors A/C),
2. Industrial compressors pumps,
3. Starters and generators,
4. Small motors,
5. Mix motors,
6. Large motors,
7. Shredder pickings from other scrap yards,
8. Large DC motors, and
9. Aluminum motors.

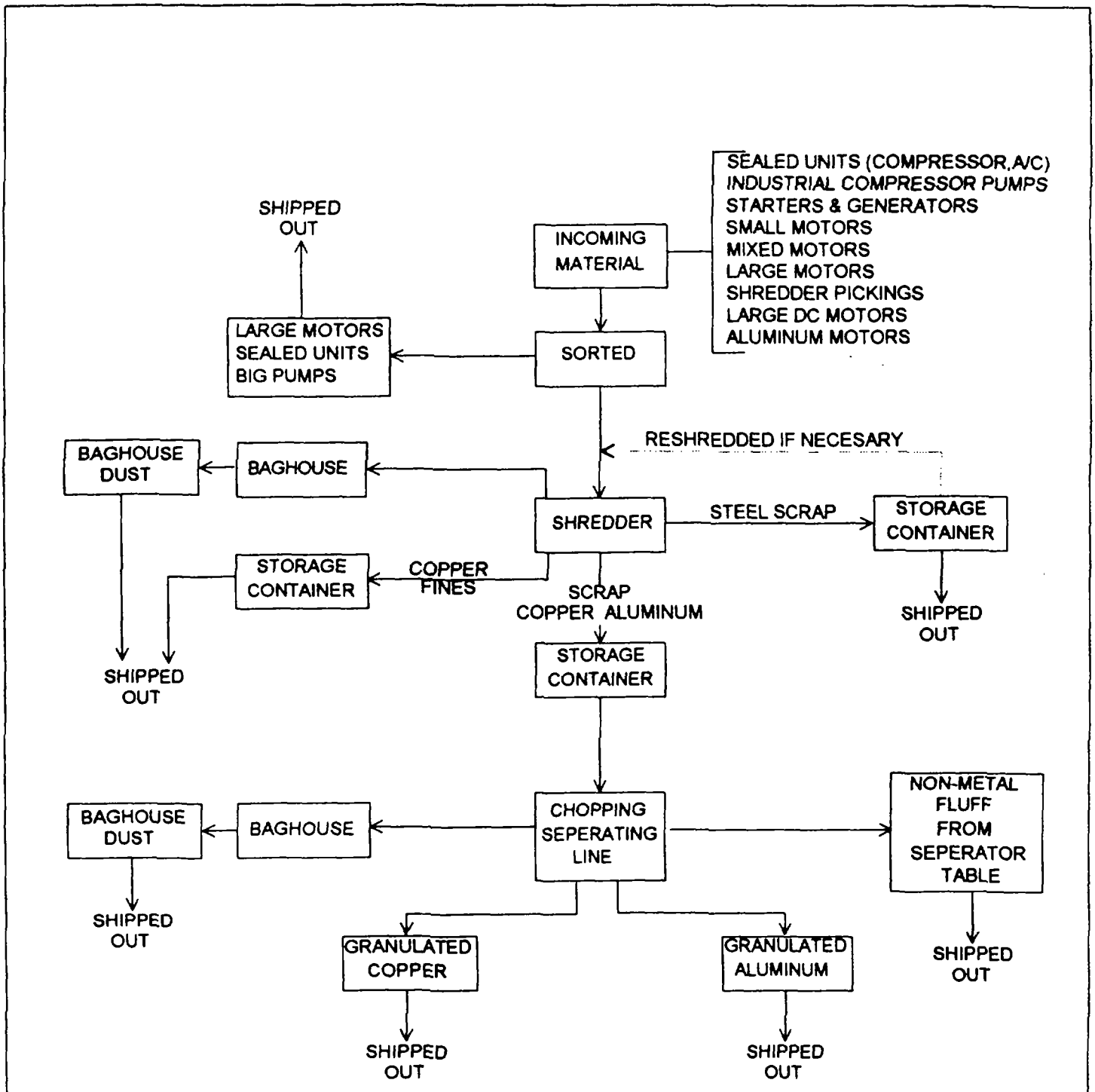

FIGURE 1

International Engineers, Inc.

PROCESS FLOW DIAGRAM

CHICAGO INTERNATIONAL EXPORTING
4020 S. WENTWORTH AVE.
CHICAGO, ILLINOIS

6-29-95	Drawing Not To Scale

The material is brought into the site via either truck or railcars. The material is off-loaded either near the front door entrance located on Wells Street (Point a) or either side of the railcar. As each material is brought into the site, it is weighed and sorted. Large motors, sealed units and big pumps are segregated and are shipped in as is condition to other sources as a recyclable product. The rest of the material is segregated into various types of materials (i.e., large motors, small motors, shredder pickings, etc.) and stored in the dedicated portion of the site. These materials are processed through the shredders for the recovery of copper and steel.

As the shredder is operated, the various material previously stored from incoming materials are picked up by an overhead crane or by a front end loader and dropped into a hopper on top of the conveyor leading into the shredder. Shredding consists of a hammer-like mechanism which continuously tears the motors apart into smaller pieces. Fine particulate matter is captured by a baghouse and the rest of the material drops into a conveyor belt which is perforated with small holes. This belt transports the processed material further into magnetic segregation units. A large metal rotary wheel takes the steel and drops into the conveyor belt that holds the steel scraps. The copper and aluminum is dropped into a separate conveyor belt that takes it to another container. Finally, shredded material, called copper fines, falls through the perforations of the conveyor belts. These copper fines are collected and stored on site for resale. The steel and copper scrap is sometimes re-ran through the shredder to break into smaller pieces. The copper and aluminum scrap is transported to the chopping/ separating lines which is located inside the main building. The chopping/ separating line breaks the scrap copper/ aluminum into smaller pieces and segregates into either copper or aluminum. The end product is stored in 55 gallon containers which are subsequently shipped out to reprocessors. The chopping/ separating line is also controlled by a separate baghouse. This baghouse is

equipped with a screw conveyor which empties the baghouse dust into a Gaylord box.

B. Site Map

A generalized site map of CIE is shown in attached Figure 2 showing various locations and the operations of the site.

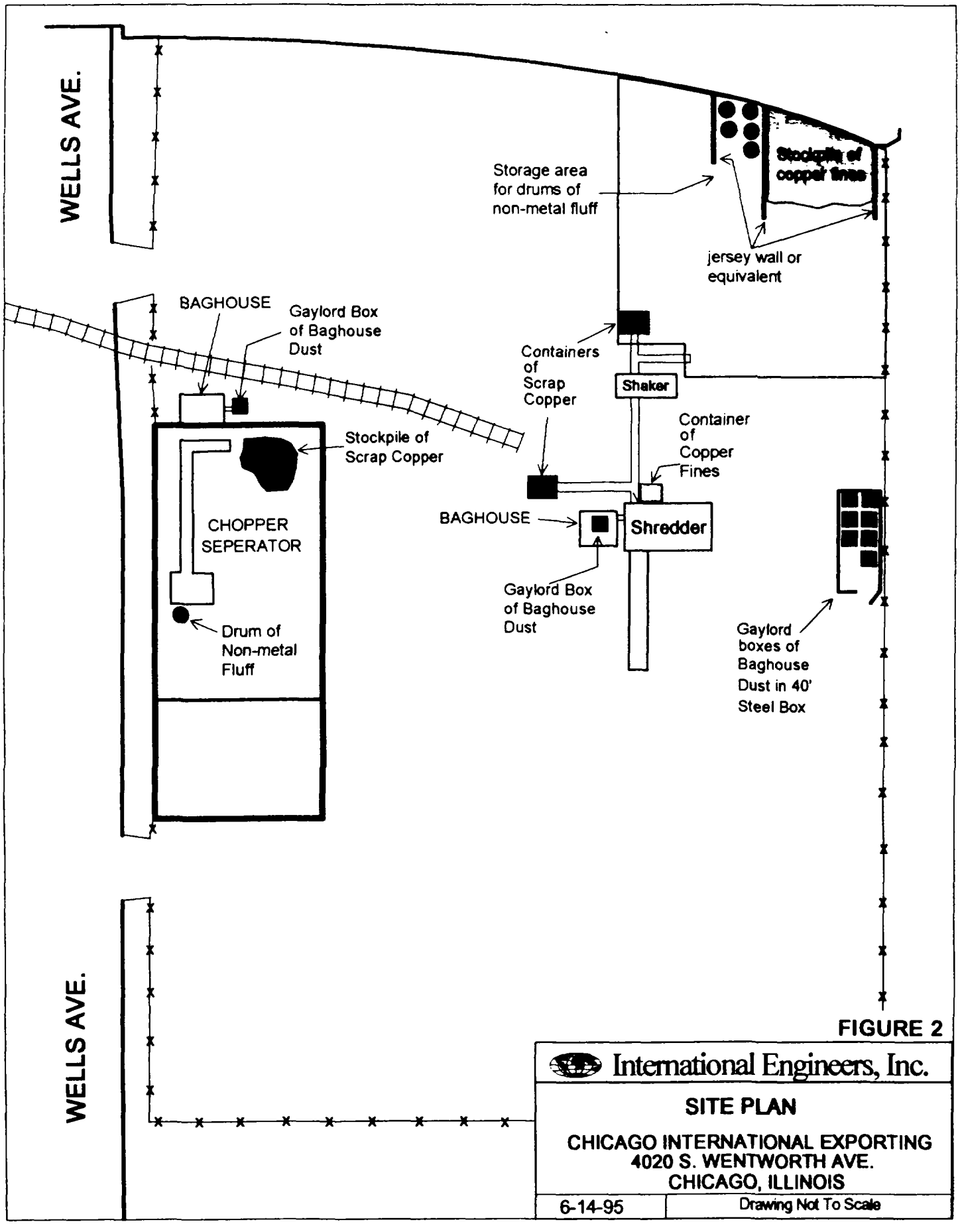

FIGURE 2

International Engineers, Inc.

SITE PLAN

CHICAGO INTERNATIONAL EXPORTING
4020 S. WENTWORTH AVE.
CHICAGO, ILLINOIS

6-14-95	Drawing Not To Scale

II. MATERIAL HANDLING PROCEDURES

Over the months of June and July 1995, a sampling program will be conducted to characterize the onsite waste and process stream materials for the purpose of determining appropriate management practices. Until the sampling program is completed, the following procedures will be implemented since they are conservatively protective of human health and the environment. Once the sampling program is completed, these procedures will be revised as appropriate to reflect actual requirements.

A. Incoming Materials

1. Shredder Pickings: Prior to acceptance of each load of shredder pickings, the load shall be visually inspected for the presence of PCB-containing articles or an excessive quantity of dirt and fluff. If PCB-containing articles or an excessive quantity of dirt and fluff are observed, the load shall not be accepted. All acceptable loads of shredder pickings shall be stockpiled on pavement only and shall not be mixed with incoming loads of other materials.

B. Shredder Materials

1. Baghouse Dust: Baghouse dust shall be transferred to a Gaylord box through a fully enclosed chute and at a slow enough rate that will prevent dust dispersion into the air. If feasible, a fully enclosed screw/auger transfer mechanism may be installed to facilitate the transfer in a more controlled manner.

   The person performing the transfer shall wear appropriate protective equipment, clothing, respirator (29 CFR Parts 1910.132 and 1910.134 will apply and 29 CFR 1910.1025 may apply) in the event of an accident that results in dust dispersion to the air.

The filled Gaylord boxes shall be weighed, labeled (Section VII.A) and stored on a pallet in a fully enclosed steel freight container until shipped offsite for disposal. Figure 2 shows the location of the freight container.

2. Copper Fines: To prevent dust dispersion and runoff from the copper fines, a permanent enclosure shall be placed around the area where copper fines fall off the shredding line. Accumulated copper fines shall then be transferred to the Area shown on Figure 2, where they may be stockpiled or retained in containers.

   The area used for storage of the copper fines shall be bounded by the railroad retaining wall on the north and two additional walls extending directly out from the railroad retaining wall. The two additional walls shall consist of jersey-wall barriers placed end-to-end or an equivalent type construction.

   Stockpiled or containerized material shall not extend beyond the limits of the bounded area. Each evening, the stockpiled or containerized material shall be covered with a durable and impermeable tarp. Or, as a permanent alternative, a 3-sided shelter with roof may be built over area, such as those used for salt bins for the storage of road salt (pole and corrugated metal construction.)

3. Scrap Copper/Aluminum: All scrap copper/aluminum shall be conveyored directly into containers at all times. If left outside, containers with scrap copper/aluminum shall be covered each evening with a tarp to prevent rainwater/snowmelt runoff from them. If a larger volume must be accumulated in a stockpile, it must be

covered each evening with a tarp or placed into a sheltered area where rainwater/snowmelt will not runoff from the stockpile and wind will not disperse dust and particulates.

4. Spillover: Shredded materials that fall off of conveyor belt shall be cleaned up each evening and placed into scrap copper/aluminum or scrap steel containers.

C. Chopper/Separator Materials

1. Baghouse Dust: Baghouse dust shall be transferred to a Gaylord box through a fully enclosed chute and at a slow enough rate that will prevent dust dispersion into the air. If feasible, a fully enclosed screw/auger transfer mechanism may be installed to facilitate the transfer in a more controlled manner.

   The person performing the transfer shall wear appropriate protective equipment, clothing, respirator (29 CFR Parts 1910.132 and 1910.134 will apply and 29 CFR 1910.1025 may apply) in the event of an accident that results in dust dispersion to the air.

   The filled Gaylord boxes shall be weighed, labeled (Section VII.A) and stored on a pallet in a fully enclosed steel freight container until shipped offsite for disposal. Figure 2 shows the location of the freight container.

2. Spillover: Materials that drop out of the conveyor system and onto the floor or equipment covers shall be collected at least once per week and returned to the scrap copper/aluminum stockpile to be re-run through the chopping/separating line.

3. Non-Metallic Fluff Off of Separating Table: This material shall be directly discharged into sturdy containers in a manner that will not disperse dust to the ambient air. At the end of each day, the material shall be transferred to a steel, DOT-approved 55-gallon drum. As each drum is filled, it shall be closed, dated and labeled and transferred to the area shown on Figure 2 for temporary storage until disposal.

III. MAINTENANCE PROCEDURES

Over the months of June and July 1995, a sampling program will be conducted to characterize the onsite waste and process stream materials for the purpose of determining appropriate management practices. Until the sampling program is completed, the following procedures will be implemented since they are conservatively protective of human health and the environment. Once the sampling program is completed, these procedures will be revised as appropriate to reflect actual requirements

A. Baghouse Maintenance and Inspection

Both baghouses shall be maintained in accordance with the manufacturers recommendations. For any work inside the baghouse, including filter repair or replacement, appropriate personal protective equipment, closing and respirator shall be worn (29 CFR Parts 1910.132 and 1910.134 will apply and 29 CFR 1910.1025 may apply). In addition, the inside area of the baghouse shall be considered a confined space (29 CFR Part 1910.146 will apply) and shall be assumed to have a hazardous atmosphere until demonstrated otherwise.

B. Grounds Maintenance and Inspection:

1. Paved Surfaces: All paved surfaces around stockpiles and equipment shall be swept at least once per week using the vacuum sweeper or by hand using a stiff broom. Whenever a stockpile of material is moved, the paved surfaces underneath shall be swept using the vacuum sweeper. If the vacuum or manual sweeping creates dusty conditions, affected personnel shall wear appropriate personal protective equipment, clothing and respirator (29 CFR Parts 1910.132 and 1910.134 will apply and 29 CFR 1910.1025 may apply).

Sweepings shall be transferred to Gaylord boxes and stored in an area where they will not be damaged by water or the sweepings may be stockpiled on pavement and covered with an impermeable tarp to prevent runoff from the stockpile.

2. Sump pits: Sump pits used to capture runoff from paved areas shall be kept free and clear of obstructions. Accumulated sediment in the sump pits shall be removed as necessary to maintain proper function of the sump pit and temporarily stored in a weatherproof container. Captured runoff shall be removed as necessary and temporarily stored in a holding tank. Within 60-70 days after filling of the tank or container, the removed sediment or captured runoff shall be tested for PCB's and TCLP lead. If the sediment and runoff do not exceed the regulatory standards of 50 ppm for PCB's and 5 mg/l for TCLP lead, they may be disposed of as a non-hazardous special waste (35 IAC Part 808) and may be stored for up to 1 year. If, however, either standard is exceeded, the corresponding waste shall be disposed of in accordance with 40 CFR Part 761 (PCB's) or 40 CFR Part 262 (TCLP lead). If the PCB's standard is exceeded, the waste must be disposed of within 1 year and if the TCLP lead standard is exceeded,the waste must be disposed of within 90 days. Section VII provides additional information on disposal requirements.

3. Inspection of Storage Areas: All containers of baghouse dust shall be checked for leaks at least once every 30 days.

C. Equipment Maintenance and Repair

1. Equipment maintenance and repair that results in dispersion of dust into the air around one or more workers shall be performed with the appropriate personal protective equipment, clothing and respirator (29 CFR Parts 1910.132 and 1910.134 will apply and 29 CFR 1910.1025 may apply). In addition, the inside of the shredder shall be considered a confined space (29 CFR 1910.146 will apply) and shall be assumed to have a hazardous atmosphere until demonstrated otherwise.

IV. SPILL AND RELEASE PROCEDURES

A. GENERAL

One purpose of this plan is to assure prompt response to the accidental release of a hazardous material.

The elements of a prompt response are as follows:

1) REPORT the spill event, if required, to city, state and federal agencies.
2) ACT promptly to CONTAIN the spill.
3) ACT promptly to CLEAN UP the spill.
4) COOPERATE with regulatory authorities in any way they suggest to prevent or control a spill.

B. RESPONSIBILITIES

The responsibility for spill control shall be vested in the Site Manager. He shall carry out all aspects of the spill prevention and control program, including personnel training, maintenance of spill equipment and supplies, development of procedures, inspections, and on site direction of operations. The Site Manager is Steven Cohen.

C. COMMUNICATIONS

The effectiveness of any action plan is dependent upon employee awareness of the communication system developed for this purpose.

SPILL DISCOVERED BY EMPLOYEE

(including contractor personnel, deliverers, etc.)

⇨ Employee

1. Determine the source of spill and stop it, if not already done and if possible.
2. Notify Site Manager (Steven Cohen). If during non-working hours, site manager shall be notified at home:

HOME PHONE NUMBER FOR STEVEN COHEN

___-___-____

3. Evaluate the magnitude of the spill and pollution potential. Call the Chicago Fire Department if a fire is involved:

CHICAGO FIRE DEPARTMENT

911

4. Direct the containment and clean up of the spill.
5. Call in additional assistance as required.

⇨ Site Manager

1. Notify city, federal and state authorities if required (see Section V). It must be reported immediately after it is discovered that a reportable quantity has spilled.

D. SPILL SUPPLIES

Emergency spill kits are located in the following areas:

- Ground level of main building

Spill kits shall contain the following:

- Bag of loose absorbent
- Dust suppressant/sweeping compound
- Portable vacuum
- Absorbent dike
- Appropriate personal protective equipment and clothing
- Appropriate respiratory equipment

E. RESPONSE PROCEDURES

1. Minor Spill of Baghouse Dust: Isolate area, don appropriate personal protective equipment, clothing and respiratory, apply dust suppressant/sweeping compound if necessary, manually sweep or use pavement sweeper or use portable vacuum, transfer into Gaylord box and store with other Gaylord boxes of baghouse dust.

2. Oil Spill: Contain flow of oil with absorbent dike if necessary, spread loose absorbent on residue and scoop or sweep up with vacuum sweeper or stiff broom, transfer into steel 55-gallon drum.

3. Major Release of Baghouse Dust: Immediately shutdown process, notify National Response Quantity for PCBs or lead (see Section V) or has gone offsite, evacuate personnel from area(s) containing released material, apply dust suppressant/sweeping compound, manually sweep or use pavement sweeper or use portable vacuum, transfer into Gaylord box and store with other Gaylord boxes of baghouse dust.

4. Baghouse Fire: Immediately shutdown process and electrical supply to baghouse, call Chicago Fire Department at 911, evacuate personnel from vicinity of baghouse.

5. Spill of Non-Metallic Fluff Off of Separator Table: Isolate area, don appropriate personal protective equipment, clothing and respirator, manually sweep and pickup or use vacuum sweeper, transfer into an undamaged steel 55-gallon drum and store with other containers of non-metallic fluff off of separator table.

V. REPORTING RELEASES

The following agencies should be notified in the event of a release that exceeds the Reportable Quantities for PCB's or lead. Notification should be made by the Site Manager or a Corporate Officer as soon as possible after discovery of a release (within 1 hour if possible) or no later than 4 hours after discovery of the release.

U.S. ENVIRONMENTAL PROTECTION AGENCY
NATIONAL RESPONSE CENTER
1-800-424-8802

VI. TRAINING PROGRAM

To ensure that this Operating and Contingency Plan is implemented properly, training/safety meetings shall be held on a routine basis as follows.

A. **New Employee Orientation**: Whenever a new employee is hired, the new employee shall be allowed 1 hour to familiarize himself with this plan. In addition, the Site Manager (ie., Steven Cohen) shall guide the new employee around the yard and explain the various operating and contingency requirements, including:

- Locations of waste and materials storage areas and proper handling and storage procedures.

- Location of spill kit and proper procedure to respond to spills or releases of waste materials.

B. **Hazardous Materials Management**: The Site Manager shall provide on the job training to each employee involved in the management of the following materials (note: the following list and training requirements is subject to change depending on the results of the sampling programs):

- Baghouse dust
- Non-metallic fluff off of separated table

This training shall cover procedures for the following:

- Using, inspecting, repairing and replacing facility emergency and monitoring equipment;

- Shutdown of operations;
- Communications or alarm systems
- Response to fires or explosions

The following records shall be maintained at the facility:

- Job title and written description of job for each position at the facility related to management of the above materials and the name of the employee filling each job;

- Records that document that the relevant training and/or job experience has been provided to appropriate personnel

VII. STORAGE AND DISPOSAL OF WASTE

Over the months of June and July 1995, a sampling program will be conducted to characterize the onsite waste and process stream materials for the purpose of determining appropriate management practices. Until the sampling program is completed, the following materials are assumed to be the only regulated materials with special disposal requirements. Once the sampling program is completed, the following list and practices will be updated. All appropriate generator identification numbers will be obtained upon completion of the sampling program.

Wastes Subject to 40 CFR Part 761	Wastes Subject to 40 CFR Part 262	Wastes Subject to 35 IAC Part 808
Baghouse Dust	Fluff Off of Separator Table	Pavement and Floor Sweepings

A. Wastes Subject to 40 CFR Part 761:

1. Baghouse dust: Each container of baghouse dust and the area in which the containers are stored shall have a label conforming to the requirements shown in Appendix A. This label shall be placed so that it can be easily read by any person inspecting or servicing the marked items or areas. Each container shall also be marked with a unique number or identifier, its weight and the date upon which it was filled. The storage area shall be managed so that the containers can be located by the date they entered storage.

   The storage area shall continue to be the 40 foot by 8 foot wide by 8 foot high steel freight container currently being used onsite. At the end of each day, the door shall be locked to prevent unauthorized entry.

Disposal of each Gaylord box of baghouse dust shall be within I year after it was generated. Currently, disposal of the baghouse dust is limited to either an incinerator or chemical waste landfill approved by the U.S. EPA pursuant to 40 CFR Part 761.70 and 40 CFR Part 761.75. However, currently proposed regulations may allow other disposal options in the future.

A manifest (EPA Form 8700-22) shall accompany each shipment of baghouse dust and one copy shall be retained at the time of shipment. Another copy of the manifest, which has been signed by the receiving facility, is supposed to be returned within 35 days and shall be saved as well. If the other copy signed by the receiving facility has not been returned within 35 days, the status of the shipment shall be determined. If the copy has not been received within 45 days, an Exception Report shall be filed with the U.S. EPA Regional Administrator. A Certificate of Disposal will be issued by the disposal facility within 30 days and shall be saved as well.

A written annual document log of the disposition of PCB's shall be prepared by July 1 for the previous calendar year (January-December.) All records shall be retained at the site for at least 3 years.

B. WASTES SUBJECT TO 40 CFR PART 262:

This section assumes that more than 2,200 pounds of 40 CFR Part 262 wastes are generated in a calendar month. If less waste is generated, less stringent requirements will apply.

1. Non-Metallic Fluff Off of Separator Table: Filled drums of non-metallic fluff shall be temporarily stored in the area shown on Figure 2. The filled drums shall be arranged in the storage area so that the labels are visible upon inspection of the area. Due to low hazard posed by this waste, on alarm system, telephone/2-way radio, portable fire extinguisher and water supply are not required. Similarly, arrangements with police, fire departments, hospitals and emergency response coordinators are not required. Contingency and emergency procedures for this material are provided in sections IV.E.5. and V.

Accumulated waste must be disposed of within 90 days. Prior to disposing, each container must be marked as follows:

> **HAZARDOUS WASTE** - Federal law prohibits improper disposal. If found contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.
>
> Generator's name and address:
>
> Chicago International Exporting
> 4020 S. Wentworth Ave.
> Chicago, Illinois
> Manifest document number:_____

With each shipment of waste, an EPA manifest (EPA Form 8700-22) shall be completed by a designated representative. A copy of the manifest shall be retained at the time of shipment. Another copy of the manifest, which has been signed by the receiving

treatment/disposal facility, will be returned and shall be saved as well. Both copies of the manifest shall be retained for 3 years. If the receiving treatment/disposal facility does not return the manifest within 35 days, the transporter and treatment/disposal facility shall be contacted to determine the status of the waste. If a manifest has not been received within 45 days, an Exception Report shall be filed with the U.S. EPA Regional Administrator. A Biennial Report shall be filed by March 1 of each even numbered year.

In addition, as a restricted waste under 40 CFR Part 268, a written notice (ie., a form typically provided by the disposal facility) must by provided to the treatment/disposal facility with each shipment of waste indicating that the waste does not meet the applicable treatment standard. These records must be retained for 5 years.

As a restricted waste, each shipment must be treated to reduce the TCLP lead levels to below 5 mg/l before it can be land disposed. Land disposal must be in a disposal facility permitted to accept hazardous waste pursuant to 40 CFR Part 270 or the equivalent State program.

C. WASTES SUBJECT TO 35 IAC PART 808

1. Pavement and floor sweepings: Pavement and floor sweepings may be stored either in Gaylord boxes or in a stockpile on pavement. In both cases, material shall be covered to prevent contact with rainwater or snowmelt. As a special non-hazardous waste, the material may be stored onsite for up to 1 year.

Disposal shall be at a landfill or other disposal facility permitted by the Illinois EPA to accept special non-hazardous waste pursuant to 35 IAC Part 807. Transportation of the waste shall be by a special waste hauler licensed pursuant to 35 IAC Part 809.

A manifest meeting the requirements of 35 IAC Part 809.501 (provided by the hauler) shall accompany each shipment of waste. The top copy shall be saved as well as the bottom copy that is returned by the final receiving facility at the end of the month. All records shall be retained for 3 years.

APPENDIX A

Large PCB Label

Label shall be as shown below. Letters and striping shall be on a yellow or white background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB container. The size of the label shall be at least 6 inches on each side.